

# Wyoming Department of Agriculture

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*The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.*



Dave Freudenthal, Governor  
John Etchepare, Director

July 7, 2008

Mr. Clarke McClung, Tongue District Ranger  
USDA-Forest Service  
2013 Eastside Second Street  
Sheridan, WY 82801

Dear Mr. McClung:

Following are our comments pertaining to the notice of intent to prepare an Environmental Impact Statement (EIS) on the Goose Creek Watershed Allotment on the Tongue Ranger District, Bighorn National Forest.

Our comments are specific to our mission: to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

This project will impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, both in and near these seven cattle and horse allotments. This EIS and decision may affect grazing permittees in the area, and these effects need to be considered and evaluated.

We strongly encourage Forest Service (FS) staff to work closely and consistently with all affected grazing permittees and agriculture producers to learn of their concerns and recommendations regarding this project. Agriculture producers are intimately familiar with areas affected by this proposal and they possess irreplaceable long-term, on-the-ground knowledge. They understand that it is in their best interests to continue to serve as stewards of the habitat, forage, and rangeland health in these affected allotments.

Many environmental impact studies are deficient in identifying or analyzing social and economic impacts. We strongly recommend that the EIS includes a full and thorough social and economic impact analysis. Since grazing on public lands represents a vital economic value to agriculture producers and local communities, we specifically suggest that that analysis includes the impacts upon livestock grazing in and adjacent to the allotments.

In regard to the alternatives evaluated in the notice of intent to prepare an EIS on the Goose Creek area, we make the following comments:

#### BOARD MEMBERS

Juan Reyes, District 1 ■ Jack Corson, District 2 ■ Jim Mickelson, District 3 ■ Jim Bennage, District 4 ■ Joe Thomas, District 5 ■ David J. Graham, District 6 ■ Gene Hardy, District 7

#### YOUTH ADVISORY BOARD MEMBERS

Patrick Zimmerer, Southeast ■ Dalin Winters, Northwest ■ John Hansen, Southwest ■ Bridget Kukowski, Northeast

We support the proposed action to continue livestock grazing using adaptive management strategies to meet or move toward Forest Plan and allotment-specific desired conditions. However, we strongly discourage any reduction in AUM's on the Goose Creek watershed. It is necessary to determine ways to meet the desired conditions with other management actions, such as fencing, water development, moving salt and minerals, and using different grazing rotation strategies. We also encourage FS personnel to find alternative funding sources for range improvements to decrease the cost of range improvements to permittees.

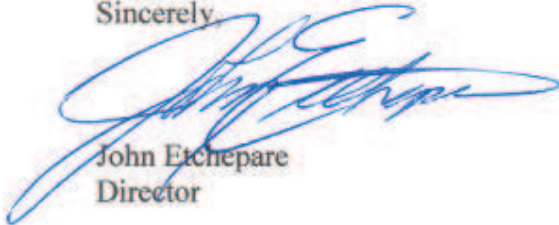
In regard to the other two proposed actions; we absolutely disagree with action 1, which supports removal of livestock from these allotments. This action would cause tremendous financial burden to permittees, as well as to the communities impacted by grazing on public lands. Proposed action 2 includes continuing current management strategies on Goose Creek. This is a tolerable action, but not preferred, as this leaves little flexibility to improve rangelands by changing management strategies to reach desired conditions.

Peer-reviewed science should underlie decisions that are made. The EIS needs to identify the science that supports the decisions and discussions regarding this project.

Decisions in the proposed plan should allow FS officials, grazing permittees and private landowners the opportunity to work cooperatively. Flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens throughout the life of this plan should also be addressed.

In conclusion, we appreciate the opportunity to comment on the scope of the proposed actions. We encourage continued attention to our concerns and we look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Etchepare", is written over the typed name and title.

John Etchepare  
Director

JE/jc

CC: Governor's Planning Office  
Wyoming Game and Fish Department  
Wyoming Board of Agriculture